

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
ASBESTOS LITIGATION

Docket No: L-2314-16 (AS)

Civil Action

CASE MANAGEMENT ORDER I

ROGER WILLIAMS and SARAH BEAUCHAMP-WILLIAMS, <i>Plaintiff(s),</i> vs. HONEYWELL INTERNATIONAL INC. <i>Defendant(s).</i>

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on July 11, 2016:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph Mandia	Plaintiff(s)
Gibbons	Ethan Stein, Esq.	Honeywell International

IT IS on this 11th day of July, 2016, *effective from the conference date*;

ORDERED as follows:

Counsel receiving this Order through computerized electronic medium (E-Mail) shall be deemed by the court to have received a copy of the filed original court document. Any document served pursuant to this Order shall be deemed to be served by mail pursuant to R.1:5-2.

Defense counsel shall notify plaintiff's counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

DISCOVERY

- | | |
|-----------------|----------------------------------------------------------------------------------------------------|
| July 22, 2016 | Defendants shall serve answers to standard interrogatories by this date. |
| July 29, 2016 | Plaintiff shall propound supplemental interrogatories and document requests by this date. |
| August 31, 2016 | Defendants shall serve answers to supplemental interrogatories and document requests by this date. |
| July 29, 2016 | Defendants shall propound supplemental interrogatories and document requests by this date. |
| August 31, 2016 | Plaintiff shall serve answers to supplemental interrogatories and document requests by this date. |

December 16, 2016 Fact discovery, including depositions, shall be completed by this date. Plaintiff's counsel shall contact the Special Master within one week of this deadline if all fact discovery is not completed.

December 16, 2016 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

August 31, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

October 7, 2016 @ 10:00am Early **telephone** settlement conference. *Counsel shall contact the court the day before with the telephone number of the attorney handling the conference.*

SUMMARY JUDGMENT MOTION PRACTICE

January 6, 2017 Summary judgment motions shall be filed no later than this date.

February 3, 2017 Last return date for summary judgment motions.

OTHER MOTIONS

September 16, 2016 Honeywell shall file motion to dismiss, if any, returnable on this date.

MEDICAL DEFENSE

November 18, 2016 Plaintiff shall serve medical expert reports by this date.

January 31, 2017 Defendants shall identify its medical experts and serve medical reports, if any, by this date. **In addition, defendants shall notify plaintiff's counsel (as well as all counsel of record) of a joinder in an expert medical defense by this date.**

LIABILITY EXPERT REPORTS

December 16, 2016 Plaintiff shall identify its liability experts and serve liability expert reports or a certified expert statement by this date or waive any opportunity to rely on liability expert testimony.

January 31, 2017 Defendants shall identify its liability experts and serve liability expert reports, if any, by this date or waive any opportunity to rely on liability expert testimony.

ECONOMIST EXPERT REPORTS

December 16, 2016 Plaintiff shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

January 31, 2017 Defendants shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

PRE-TRIAL AND TRIAL

January 26, 2017 @ 10:00am Settlement conference. All defense counsel shall appear with authority to negotiate settlement and have a representative authorized to negotiate settlement available by phone. Any request to be excused from the settlement conference shall be made to the Special Master no later than 4:00pm of the day prior to the conference.

10 business days prior to trial Pretrial Information Exchange Form due.

February 27, 2017 **Trial-Ready** Date.

Plaintiff(s) counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.

/s/ Ana C. Viscomi
ANA C. VISCOMI, J.S.C.

cc: Clerk, Mass Tort